

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 1:06-CR-00134-CDP
	)	
MICHAEL D. MEADOR,	)	
	)	
Defendant.	)	

**MOTION FOR EXTENSION OF TIME FOR GOVERNMENT TO RESPOND TO  
DEFENDANT’S SUPPLEMENTAL MOTION FOR COMPASSIONATE RELEASE**

The United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Jason S. Dunkel, Assistant United States Attorney for said District, requests a 21-day extension of time, up to and including January 27, 2021, for the Government to respond to Defendant Meador’s Supplemental Motion for Compassionate Release (Doc. #757). In support of its request, the Government states as follows:

1. Defendant filed his Supplemental Motion on December 7, 2020. The Government’s deadline to respond is currently January 6, 2020.
2. Due to the press of business—including the volume of compassionate release requests filed in this District— and the holidays that occurred during the original 30-day response time the Government seeks additional time to prepare its response.
3. The volume of material required to be reviewed in preparing a response to this Supplemental Motion is greater than the volume of material in other cases. Neither Government attorney who prosecuted this case is still with the U.S. Attorney’s Office. The undersigned has been newly assigned to this case and is reviewing the voluminous record, including a jury trial

and a sentencing hearing with a defense witness, that resulted in the Defendant's lengthy sentence. The Government anticipates being able to file a response within the requested 21-day extension.

WHEREFORE, the United States respectfully requests a 21-day extension of time to respond to Defendant's Supplemental Motion for Compassionate Release, so that the response may be due on or before January 27, 2020.

Respectfully submitted,

SAYLER A. FLEMING  
United States Attorney

/s/ Jason S. Dunkel

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#### **CERTIFICATE OF SERVICE**

I hereby certify that on January 6, 2021, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ Jason S. Dunkel

JASON DUNKEL, #65886(MO)  
Assistant United States Attorney